

EXHIBIT A

DATE	OCCURRENCE	CITATION TO RECORD
Sept 14, 2006	Plaintiffs issue subpoena requesting, <i>inter alia</i> , 1999-2000 Run Reports and Hoog In-Charge Records.	Pls' Motion Ex A
Oct 2, 2006	Response to subpoena due.	<i>Id.</i>
Jan 26, 2007	City responds to subpoena. 1999-2000 Run Reports and Hoog In-Charge Records <i>not</i> produced.	Pls' Motion Ex B
Feb 1, 2007	Plaintiffs' counsel inspects documents at the office of internal investigations.	Defs' Memo at 2
April 5, 2007	Plaintiffs' counsel inspects documents at the office of internal investigations. Plaintiffs' counsel determines that the 1999-2000 Run Reports and the Hoog In-Charge Records are <i>not</i> being made available for inspection.	<i>Id.</i>
April 9, 2007	Plaintiffs' counsel sends letter to Defendants' counsel requesting production of 1999-2000 Run Reports and Hoog In-Charge Records.	Langsam Aff. ¶3 Ex. 1
April 23, 2007	Plaintiffs' counsel sends a follow-up letter.	<i>Id.</i> ¶4 Ex. 2
April 24, 2007	Defendants' counsel forwards Plaintiffs' counsel's April 9 letter in an e-mail to District Chief Jones, but the e-mail only mentions that Plaintiffs want to inspect additional internal investigation documents (those maintained by Rescue 1 and 2).	Def's Ex. A
May 18, 2007	Plaintiff's counsel meets with Defendants' counsel to review internal investigation documents; however, the internal investigation office is locked and counsel cannot gain access. Plaintiffs' counsel gives Defendants' counsel list of "Additional Documents to Be Produced Pursuant to September 14, 2006 Subpoena, as of May 18, 2007." Defendants' counsel states that the remainder of the documents would be produced.	<i>Id.</i> ¶6 Ex. 3
May 22, 2007	Plaintiffs' counsel sends letter to Defendants' counsel asking when remaining documents can be obtained.	<i>Id.</i> ¶7 Ex. 4
June 1, 2007	Plaintiffs' counsel inspects documents at the office of internal investigations.	
June 7, 2007	Defendants' counsel sends e-mail to District Chief Clark stating that Plaintiffs' "latest request for records" includes the 1999-2000 Run Reports and the Hoog In-Charge Records and asking who is the appropriate person in the Fire Department to request these documents from.	Defs' Ex C
June 8, 2007	Defendants' counsel sends e-mail to Plaintiffs' counsel stating he has "farmed out" Plaintiffs' "primary requests."	Langsam Aff. ¶8 Ex. 5.
June 15, 2007	Defendants' counsel selects July 2, 2007 as the date in the Joint Status Report by which the remaining documents will be produced.	<i>Id.</i> ¶9 Ex. 6

June 21, 2007	Telephone status conference held. Dispositive motion and trial dates set. Plaintiffs' counsel believes they can meet these deadlines based on the July 2 date given by Defendants' counsel to complete the production.	<i>Id.</i> ¶11
June 25, 2007	Defendants' counsel sends e-mail stating he may not be able to produce the Medical Run Reports (F33s) by July 2. Plaintiffs' counsel responds that we will agree to a very short extension beyond July 2 and offers "bodies to review records." Defendants' counsel raises HIPAA concerns for the first time.	¶13 Ex. 9
June 26, 2007	Defendants' counsel produces Hoog's and Lotz's work schedules, documents from their personnel files pertaining to this case, and an undated chart showing the race of firefighters by assignment.	<i>Id.</i> ¶16 Ex. 12
June 27, 2007	Plaintiffs' Counsel sends Defendants' counsel a list of "Additional Documents to Be Produced as of June 27, 2007."	<i>Id.</i>
July 2, 2007	No additional documents produced.	
July 27, 2007	Court orders Defendants to produce 1999-2000 Run Reports and Hoog In-Charge Records by August 31, 2007	
Aug 30, 2007	Plaintiffs' counsel calls Defendants' counsel to make arrangements to obtain documents. Defendants' counsel informs Plaintiffs' counsel for the first time that many of the documents will be produced on microfiche.	<i>Id.</i> ¶18
Aug 31, 2007	Defendants produce 1999-2000 Run Records on 55 microfiche, which include thousands of non-responsive documents. Plaintiffs' counsel tells Defendants' counsel it would take "many months" to produce hard copies of the requested documents from the microfiche. Defendants do <i>not</i> produce the Hoog In-Charge Records outside of the one-year period May 1999-July 2000.	<i>Id.</i>